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16 Attorneys for Plaintiff
17 LOLITA MORADA

18
19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 LOLITA MORADA,

Case No. 3:13-cv-05942-JCS

23 Plaintiff,

**JOINT STIPULATION TO EXTEND
TIME TO RESPOND TO COMPLAINT**

24 vs.

25 KAISER FOUNDATION HEALTH PLAN,
INC., a California Corporation; THE
VANGUARD GROUP, INC.,; and DOES 1 to
26 100, Inclusive,

27 Defendants.
28

JOINT STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT; Case No. 3:13-cv-05942-JCS

1 WHEREAS, Plaintiff originally filed the Complaint in this action in California Superior
2 Court, County of San Francisco, on September 24, 2013, and served Defendants with the
3 Complaint and Summons on November 25, 2013;

4 WHEREAS, Defendants removed the action from Superior Court on December 23, 2013,
5 and, under Federal Rule of Civil Procedure 81(c), now have until December 30, 2013, to respond to
6 the Complaint;

7 WHEREAS, the parties believe they have a basis on which to reach a settlement of this
8 matter in its entirety and, to facilitate such discussions, wish to extend the time for Defendants
9 Kaiser Foundation Health Plan, Inc. ("Kaiser") and The Vanguard Group, Inc. ("Vanguard") to
10 respond to the Complaint.

11 NOW, THEREFORE, under Local Rule 6-1(a), Plaintiff Lolita Morada hereby stipulates
12 and agrees that the deadline for Defendants to answer or otherwise respond to the Complaint shall
13 be and hereby is extended 60 days, until **February 28, 2014**. This change does not alter any event
14 or deadline already fixed by Court order.

15 **IT IS SO STIPULATED.**

16 DATED: December 27, 2013

TRUCKER ♦ HUSS

17
18 By: /s/Charles M. Dyke
19 Charles M. Dyke
Attorneys for Defendant
KAISER FOUNDATION HEALTH PLAN, INC.

20 DATED: December 27, 2013

MORGAN, LEWIS & BOCKIUS LLP

21
22 By: /s/Roberta H. Vespremi
23 Roberta H. Vespremi
Attorneys for Defendant
THE VANGUARD GROUP, INC.

24 DATED: December 27, 2013

LAW OFFICES OF RODEL E. RODIS

25
26 By: /s/Rodel E. Rodis
27 Rodel E. Rodis
Attorney for Plaintiff
LOLITA MORADA

1 I attest that my firm has obtained Mr. Rodis' and Ms. Vespremi's concurrence in the filing
2 of this document.

3 DATED: December 27, 2013

TRUCKER ♦ HUSS

4 By: /s/ Charles M. Dyke

Charles M. Dyke

5 Attorneys for Defendant

6 KAISER FOUNDATION HEALTH PLAN, INC.

7 Dated: 1/6/14



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